

Colorado Department of Health
Hazardous Materials & Waste Management Division

Comments

on

FINAL

PHASE I RFI/RI WORK PLAN

FOR

OU-15

(Inside Building Closures)

ROCKY FLATS PLANT

October, 1992

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Table of Contents: Any page numbering changes resulting from the comments below should be corrected.

Table 3.1: On the first page, the second entry under the Citation column probably should be moved up to align with the beginning of the tank systems closure description. The first section cited under the Comments column should be 265.197 rather than 265.147.

Section 5.7.1: Although DOE's *Response to Comments* document states that the Workplan "has been modified to indicate that the Clean Closure Performance Standards will serve as the risk-based remedial action goals for OU15," this change has not been made in the text.

Section 7.0: Steam rinsate sampling and analyses are proposed for all six IHSSs, followed by up to three additional steam cleanings. The additional steam cleanings constitute remedial action and may be appropriate to propose as part of an IM/IRA, but not in a RFI/RI Workplan. References to "steam cleaning" should be eliminated from this field sampling plan including Section 7.3 (page 7-9), Section 7.3.1.4, Section 7.3.2 (for each of the IHSSs), Table 7-2, and Figure 7-1. The paragraph on page 7-8 describing cleanup should be renamed and refocussed.

Section 7.3.1.3: Please justify the need to reduce the number of on-site beryllium analyses to a few as 20% of the swipe samples taken for radioactivity.

Section 7.3.2: The following are IHSS-specific comments pertaining to the OU-15 Field Sampling Plan. Several of these comments are a result of a site inspection. Other modifications to the field sampling plan may be appropriate and will be considered by the Department.

IHSS 178: A small circular area marked by faded and scuffed paint on the opposite side of the pillar from the designated IHSS area was noticed during a site inspection. This area is similar in size and shape to the designated drum storage area and should be included in the investigation.

IHSS 179: Since Building 865 is scheduled to undergo "transition" sometime in the next several months, it will be necessary to coordinate the RFI/RI investigation with building clean-up efforts. Use of the large steam cleaning/vacuum unit in this building should be weighed against a smaller machine dedicated to OU-15.

IHSS 204: The interior of the Chip Roaster could probably be sufficiently characterized by sampling through various access ports rather than by steam rinsate sampling. The additional incidents involving the Chip Roaster which were mentioned during the site inspection should be documented for consideration as part of Stage 1 data. Consider including ancillary equipment mentioned in the original closure plans as part of this sampling plan. This equipment includes flue ducts, gear reducer, cyclone separator, plenum pre-filter, heat exchanger, blower, and equipment used to wash and feed ships into the roaster.

IHSS 217: Laboratory personnel indicated during the site inspection that various chemical substances other than cyanide may have been processed at the Bench-Scale Treatment unit. This possibility should be investigated as part of Stage 1 and the knowledge used to expand the analyte list, if necessary. All cyanide-contaminated ancillary equipment mentioned in the original closure plans (2 4-liter bottles, cyanide still, chlorine-specific electrode) as well as surrounding walls and floor should be included. Because of the risk of spreading contaminants by steam sampling, use of a decontamination foam cleaning agent or other sampling method is suggested. Whether an IM/IRA or a ROD/CAD process is used to close this unit, it can be disposed of at DOE's discretion once the appropriate decision document is issued.

Section 8.1: The paragraph which begins on the middle of page 8-2 must be expanded to be complete. Sections VII.D.1.a, VII.D.1.b, and VII.D.1.c of the Statement of Work each require DOE to submit a technical memorandum. These memoranda respectively are to list hazardous substances present at each IHSS, to describe use exposure scenarios, and to list the toxicological and epidemiological studies utilized for the toxicity assessment. Section VIII of the SOW allows these risk assessment components mentioned above to be combined into one consolidated technical memorandum. If one or more of these components does not apply due to a lack of contamination, then its elimination should be briefly justified in that consolidated technical memorandum.